



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

December 10, 2021

**BY EMAIL**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

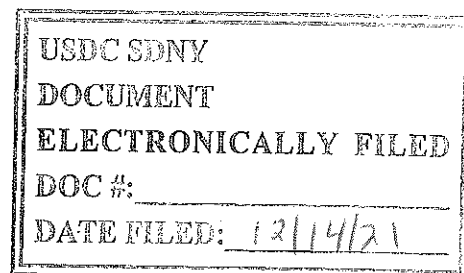
Re: *United States v. Alixa Olivas Saucedo*, 21 Cr. 77 (RMB)

Dear Judge Aaron:

The Government writes, with the consent of defense counsel, to respectfully request an adjournment of certain pretrial deadlines and an exclusion of time under the Speedy Trial Act. Specifically, the Government seeks to adjourn the deadline for requests to charge and motions *in limine* from December 10, 2021, until December 22, 2021; adjourn the deadline for responses to those filings from December 17, 2021, until January 5, 2022; and adjourn the final pretrial conference, currently scheduled for December 21, 2021, until the week of January 24, 2022.

Since the defendant was arrested, the parties have had extensive communications about appropriate pretrial resolutions to this matter, including written correspondence and supervisory reviews within the U.S. Attorney's Office. The Government expects to be able to make a plea offer in the short term, and believes the requested adjournment will give the parties additional time to complete their discussions about a pretrial resolution. The Government understands that trial in this matter has been scheduled to begin on February 7, 2022.

The Government further requests, with consent from defense counsel, that the Court exclude time, pursuant to 18 U.S.C. § 3161(h)(7), from December 21, 2021, until the date of the next conference. The Government submits that the ends of justice served by granting the exclusion of time outweigh the best interests of the public and the defendant in a speedy trial



because the exclusion of time will permit the parties to continue their detailed discussions concerning a potential pretrial disposition of this case.

The defendant consents to the above-requested adjournment and the exclusion of time under the Speedy Trial Act.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/  
Kedar S. Bhatia  
Assistant United States Attorney  
(212) 637-2465

Cc: Martin Cohen, Esq.

Applications are granted.  
The final pretrial conference  
will be held on 1/25/22  
at 12:00 noon. Time is  
excluded pursuant to the  
Speedy Trial Act for the  
reasons set forth in this letter  
until the trial date, 2/7/22.  
SO ORDERED:  
Date: 12/14/21 Richard M. Berman  
Richard M. Berman, U.S.D.J.